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Attorneys for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

JEFFREY MOLNAR, WESLEY
THORNTON, AILEEN MARTINEZ,
CHIQUITA BELL, TEYIA BOLDEN, and
ANTOINETTE STANSBERRY, on behalf of
themselves, all others similarly situated, and
the general public,

Plaintiffs,

v.

NCO FINANCIAL SYSTEMS, INC., a
Pennsylvania Corporation,

Defendant.

CASE NO. 3:13-cv-00131-BAS-JLB

CLASS ACTION

DISCOVERY MATTER

**SUPPLEMENTAL DECLARATION
OF KAS GALLUCCI IN
OPPOSITION TO DEFENDANT'S
MOTION FOR DISCOVERY
SANCTIONS**

Date: October 24, 2014

Time: 1:30 p.m.

Courtroom: 1D

Judge: Hon. Jill L. Burkhardt

1 I, Kas L. Gallucci, declare:

2 1. I am a member in good standing of the State Bar of California, and the
3 United States District Court for the Southern District of California. I am an associate at
4 the Law Offices of Ronald A. Marron. I, along with my co-counsel, represent the
5 Plaintiffs in the above-captioned action. I have personal knowledge of the facts stated
6 herein, and, if called on to do so, could and would testify competently thereto. I make
7 this Supplemental Declaration in opposition to Defendant's Motion for Discovery
8 Sanctions.

9 2. Attached hereto as **Exhibit F** is a true and correct copy of NCO Financial
10 Systems, Inc.'s Combined Meet and Confer Request, Objections to Subpoena to the
11 ADT Corporation, Motion to Quash, and Motion for Protective Order. Beginning on
12 page 14, this document shows that Defendant has records of all phone calls that were
13 made to Plaintiffs.

14
15 I declare under penalty of perjury of the law of the United States that the
16 foregoing is true and correct.

17
18
19 Dated: October 24, 2014

/s/ Kas Gallucci

Kas Gallucci

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